

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

LEO EDWARD WHELAN

DEBTOR

**CASE NO. 15-41659
CHAPTER 7**

**BILL HUDDLESTON
PLAINTIFF**

v

**LEO EDWARD WHELAN
DEFENDANT**

Adversary Proceeding #: _____

**APPLICATION FOR TURNOVER RELIEF OF Wexco Resources, LLC
Shares Owned by Leo Edward Whelan**

COMES NOW, Bill Huddleston, Plaintiff, and files this his *Complaint for Turnover of Wexco Resources, LLC Shares Owned by Leo Edward Whelan*, and would show the Court as follows.

1. *Parties.* Bill Huddleston, Plaintiff and judgment creditor in this cause, requests that the Court grant this Application for Turnover Relief against LEO EDWARD WHELAN, Defendant and judgment debtor.
2. *Judgment.* Plaintiff recovered judgment against Defendant on August 29, 2016 in this cause. The judgment remains unsatisfied.
3. *Property Subject to Turnover.* Defendant, LEO EDWARD WHELAN, owns property described as 100% of the Wexco Resources, LLC Shares. This property cannot readily be attached or levied on by ordinary legal process. This property is not exempt under any statute from attachment,

4. *Motion for Turnover.* Plaintiff moves the Court to order Defendant, LEO EDWARD WHELAN, to turn over the property identified above, with all documents and records related to that property, to Sergi & Associates; 329 South Guadalupe Street, San Marcos, TX 78666, by April 27, 2017, on or before 5 p.m.

5. *Attorney's Fees.* Plaintiff is entitled to recover reasonable attorney's fees and costs. Reasonable fees for the attorney's services rendered and to be rendered are at least \$1,500.

6. This is an attempt to collect a debt. Any information obtained will be used for that purpose.

7. *Prayer.* Plaintiff prays that the Court-

- a. set this matter for hearing;
- b. issue the orders requested in this application;
- c. grant Plaintiff at least \$1,500 as reasonable attorney's fees;
- d. grant Plaintiff reasonable expenses incurred in obtaining these orders; and
- e. grant all further relief to which Plaintiff may be entitled.

Respectfully submitted,

By: /S/ David Sergi

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